

DEPARTMENT OF ENVIRONMENTAL CONSERVATION

AIR QUALITY OPERATING PERMIT

Permit No. 189TVP01
Application No. 189

Issue Date: July 24, 2002
Expiration Date: August 24, 2007

The Department of Environmental Conservation, under the authority of AS 46.14 and 18 AAC 50, issues an operating permit to the Permittee, **Cook Inlet Pipe Line Company**, for the operation of the **Christy Lee Loading Platform**.

This permit satisfies the obligation of the owner and operator to obtain an operating permit as set out in AS 46.14.130(b).

As required by AS 46.14.120(c), the Permittee shall comply with the terms and conditions of this operating permit.

This Operating Permit becomes effective August 26, 2002.

John F. Kuterbach, Manager
Air Permits Program

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List of Abbreviations Used in this Permit

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|-----------------------|--|
| AAC | Alaska Administrative Code |
| ADEC | Alaska Department of Environmental Conservation |
| AS..... | Alaska Statutes |
| ASTM..... | American Society for Testing and Materials |
| C.F.R. | Code of Federal Regulations |
| COMS | Continuous Opacity Monitoring System |
| dscf..... | Dry standard cubic feet |
| EPA | US Environmental Protection Agency |
| gr./dscf..... | grain per dry standard cubic feet (1 pound = 7000 grains) |
| GPH..... | gallons per hour |
| HAPs | Hazardous Air Pollutants [hazardous air contaminants as defined in AS 46.14.990(14)] |
| ID..... | Source Identification Number |
| kPa..... | kiloPascals |
| MACT | Maximum Achievable Control Technology |
| NESHAPs..... | Federal National Emission Standards for Hazardous Air Pollutants [as defined in 40 C.F.R. 61] |
| NSPS | Federal New Source Performance Standards [as defined in 40 C.F.R. 60] |
| ppm..... | Parts per million |
| PS | Performance specification |
| PSD | Prevention of Significant Deterioration |
| RM..... | Reference Method |
| SIC. | Standard Industrial Classification |
| SO ₂ | Sulfur dioxide |
| TPH..... | Tons per hour |
| TPY | Tons per year |
| VOC | volatile organic compound [as defined in 18 AAC 50.990(103)] |
| wt%..... | weight percent |

Section 1. Identification**Names and Addresses**

Permittee: **Cook Inlet Pipe Line Company**
2000 W. International Airport Road, Suite D-6
Anchorage, AK 99502

Facility: **Christy Lee Loading Platform**

Location: 60° 34' 43" North; 152° 08' 2.7" West

Physical Address: West Side of Cook Inlet
near Drift River

Owner: Cook Inlet Pipe Line Company
2000 W. International Airport Road, Suite D-6
Anchorage, AK 99502

Operator: Unocal Global Trade
2000 W. International Airport Road, Suite D-6
Anchorage, AK 99502

Permittee's Responsible Official: James A. Shew

Designated Agent: James A. Shew
2000 W. International Airport Road, Suite D-6
Anchorage, AK 99502

Facility and Building Contact: James Shew, Manager
2000 W. International Airport Road, Suite D-6
Anchorage, AK 99502
(907) 243-1166

Fee Contact: John Hammelman
260 Caviar Street
Kenai, AK 99611
(907) 283-5507

SIC Code of the Facility:

4491 - Marine Tanker Loading - Crude Oil

[18 AAC 50.350(b), 1/18/97]

Section 2. General Emission Information

Emissions of Regulated Air Contaminants, as provided in the Permittee's application:

Nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), particulate mater (PM-10), volatile organic compounds (VOCs), lead, and hazardous air contaminants (HACs).

Operating Permit Classifications:

1. 18 AAC 50.325(b)(1)
2. 18 AAC 50.325(b)(2)

Facility Classifications as described under 18 AAC 50.300(b)-(f):

1. 18 AAC 50.300(c)(1)
2. 18 AAC 50.300(f)

[18 AAC 50.350(b), 1/18/97]

Section 3. Fee Requirements

- 1. General.** The Permittee shall pay assessed fees in accordance with AS 46.14.240 -- 250 and 18 AAC 50.400 -- 420.

[18 AAC 50.350(c) & 18 AAC 50.400 – 420, 1/18/97]

- 2. Assessable Emissions.** The Permittee shall pay to the department an annual emission fee based on the facility's assessable emissions as determined by the Department under 18 AAC 50.410. The assessable emission fee rate is set out in 18 AAC 50.410. The department will assess fees per ton of each air contaminants that the facility emits or has the potential to emit in quantities greater than 10 tons per year. The quantity for which fees will be assessed is the lesser of

- 2.1 the facility's assessable potential to emit of 5,868 tpy; or
- 2.2 the facility's projected annual rate of emissions that will occur from July 1 to the following June 30, based upon actual annual emissions emitted during the most recent calendar year or another 12 month period approved in writing by the department, when demonstrated by
 - a. an enforceable test method described in 18 AAC 50.220;
 - b. material balance calculations;
 - c. emission factors from EPA's publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035; or
 - d. other methods and calculations approved by the department.

[18 AAC 50.410, 1/18/97 & 18 AAC 50.346(a)(1), 5/3/02]

- 3. Assessable Emission Estimates.** Emission fees will be assessed as follows:

- 3.1 No later than March 31 of each year, the Permittee may submit an estimate of the facility's assessable emissions to ADEC, Air Permits Program, ATTN: Assessable Emission Estimate, 410 Willoughby Ave., Juneau, AK 99801-1795; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the department can verify the estimates, or
- 3.2 If no estimate is received on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit set forth in condition 2.1.

[18 AAC 50.410, 1/18/97 & 18 AAC 50.346(a)(1), 5/3/02]

Section 4. Source Inventory and Description

Sources listed below have specific monitoring, record keeping, or reporting conditions in this permit. Source descriptions and ratings are given for identification purposes only.

Table 1. Source Inventory

| ID | Source Name | Source Description | Rating/size | Install Date |
|--------------------|---------------------------|-------------------------------------|--------------------|---------------------|
| Diesel Fuel | | | | |
| 1 | 4B12694-Engine#1 | Caterpillar 3304 Platform Generator | 90 kw | 1997 |
| 2 | 4B21338-Engine#2 | Caterpillar 3304 Platform Generator | 90 kw | 1997 |
| 3 | 4B14839-Engine#3 | Caterpillar 3304 Platform Generator | 90 kw | 1997 |
| Crude Oil | | | | |
| 4 | Tanker Loading Operations | | | 1966 |

Section 5. Source-Specific Requirements**Fuel-Burning Equipment***Visible Emissions*

4. The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from Source IDs 1 – 3 to reduce visibility through the exhaust effluent by either;
- a. greater than 20 percent for a total of more than three minutes in any one hour¹,
or
[18AAC 50.055(a)(1), 1/18/97 & 40 CFR 52.70, 11/18/98]
 - b. more than 20 percent averaged over any six consecutive minutes.
[18 AAC 50.055(a)(1), 5/3/02]
- 4.1 Monitor, record and report according to Section 13.
[18 AAC 50.350(d)(1)(D) & 18 AAC 50.350(g)–(i), 1/18/97]

Particulate Matter

5. The Permittee shall not cause or allow particulate matter emitted from Source IDs 1 - 3 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.
- 5.1 Monitor, record and report according to Section 13.
[18 AAC 50.055(b)(1), 1/18/97; 18 AAC 50.350(d)(1)(C), 6/21/98; & 18 AAC 50.350(g) – (i), 1/18/97]

Sulfur Compound Emissions

6. The Permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from Source IDs 1 - 3 listed in Table 1 to exceed 500 ppm averaged over three hours.
[18 AAC 50.055(c), 5/3/02 & 18 AAC 50.350(d)(1)(D), 6/21/98]

Liquid Fuel (Source IDs 1 – 3):**Monitoring and Record Keeping -**

- 6.1 The Permittee shall do one of the following for each shipment of fuel:
- a. if the fuel grade requires a sulfur content less than 0.5% by weight, keep receipts that specify fuel grade and amount; or

¹ For purposes of this permit, the “more than three minutes in any one hour” criterion in this condition and condition 8.1 will no longer be effective when the Air Quality Control (18 AAC 50) regulation package effective 5/3/02 is adopted by the U.S. EPA.

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- b. if the fuel grade does not require a sulfur content less than 0.5% by weight, keep receipts that specify fuel grade and amount and
 - (i) test the fuel for sulfur content; or
 - (ii) obtain test results showing the sulfur content of the fuel from the supplier or refinery; the test results must include a statement signed by the supplier or refinery of what fuel they represent.
- 6.2 Fuel testing under condition 6.1 must follow an appropriate method listed in 18 AAC 50.035 or another method approved in writing by the department.
- 6.3 If a load of fuel contains greater than 0.75% sulfur by weight, the Permittee shall calculate SO₂ emissions in PPM using either Section 15 or Method 19 of 40 C.F.R. 60, Appendix A-7, adopted by reference in 18 AAC 50.040(a).

[18 AAC 50.350(g) - (h), 1/18/97 & 18 AAC 50.346(c), 5/3/02]

[18 AAC 50.350(g) - (i), 1/18/97]

Reporting -

- 6.4 The Permittee shall report as follows:
- a. If SO₂ emissions are calculated under condition 6.3 to exceed 500 ppm, the Permittee shall report under condition 36. When reporting under this condition, include the calculation under Section 15.
 - b. The Permittee shall include in the report required by condition 37
 - (i) a list of the fuel grades received at the facility during the reporting period;
 - (ii) for any grade with a maximum fuel sulfur greater than 0.5% sulfur, the fuel sulfur of each shipment; and
 - (iii) for fuel with a sulfur content greater than 0.75%, the calculated SO₂ emissions in PPM.

[18 AAC 50.350(i), 1/18/97 & 18 AAC 50.346(c), 5/3/02]

Section 6. Facility-Wide Requirements**Aggregation**

7. Permittee shall aggregate potential emissions from Source IDs 1 –3 from Christy Lee Loading Platform, and Source ID 14 from the Drift River Terminal, for the purpose of determining applicability with the modification requirements of 18 AAC 50.300(h)(3). The increase in emissions of Source IDs 1 – 3 and 14 have been established at 20.9 tons of NO_x, 3.08 tons of SO₂, 4.4 tons of CO, 1.5 tons of PM-10, 6.09 tons of VOCs per year.

[18 AAC 50.990(37), 1/18/97]

[18 AAC 50.910, 1/18/97]

Section 7. Insignificant Sources

This section contains the requirements that the Permittee identified under 18 AAC 50.335(q)(2) as applicable to insignificant sources at the facility. This section also specifies the testing, monitoring, reporting, and record keeping for insignificant sources that the department finds necessary to ensure compliance with the applicable requirements. Insignificant sources are not exempted from any air quality control requirement or federally enforceable requirement, except that the requirements of conditions 36 and 37 do not apply to this section.

As set out in 18 AAC 50.350(m), the shield of AS 46.14.290 does not apply to insignificant sources.

8. The Permittee shall not cause or allow visible emissions, excluding condensed water vapor to reduce visibility through the exhaust effluent by either;
 - 8.1 greater than 20 percent for a total of more than three minutes in any one hour², or
[18AAC 50.055(a)(1), 1/18/97 & 40 CFR 52.70, 11/18/98]
 - 8.2 more than 20 percent averaged over any six consecutive minutes.
[18 AAC 50.055(a)(1), 5/3/02]
9. The Permittee shall not cause or allow particulate matter emitted from an industrial process or fuel-burning equipment, to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.
[18 AAC 50.055(b)(1), 1/18/97]
10. The Permittee shall not cause or allow sulfur compound emissions, expressed as SO₂, from an industrial process or fuel-burning equipment, to exceed 500 ppm averaged over three hours.
[18 AAC 50.055(c), 1/18/97]
11. Based on reasonable inquiry, the Permittee shall certify compliance with the requirements specified in conditions 8, 9, and 10 as set out in condition 38.
[18 AAC 50.350(m)(3), 6/21/98]

² See footnote 1.

Section 8. Generally Applicable Requirements

- 12. Asbestos NESHAP.** The Permittee shall comply with the requirements set forth in 40 C.F.R. 61.145, 61.150, and 61.152, and the applicable sections set forth in 40 C.F.R. 61, Subpart A and Appendix A.

[18 AAC 50.040(b)(3) & 18 AAC 50.350(d)(1), 1/18/97]
[Federal Citation: 40 C.F.R. 61, Subpart M, 12/19/96]

- 13. Refrigerant Recycling and Disposal.** The Permittee shall comply with the standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F.

[18 AAC 50.040(d) & 18 AAC 50.350(d)(1), 1/18/97]
[Federal Citation: 40 C.F.R. 82, Subpart F, 7/1/97]

14. Good Air Pollution Control Practice.

14.1 The Permittee shall do the following for Sources ID(s) 1 - 3:

- a. perform regular maintenance considering the manufacturer's or the operator's maintenance procedures;
- b. keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format;
- c. keep a copy of either the manufacturer's or the operator's maintenance procedures.

[18 AAC 50.346(b)(2), 5/3/02]

- 15. Dilution.** The Permittee shall not dilute emissions with air to comply with this permit.

[18 AAC 50.045(a), 1/18/97]

- 16. Stack Injection.** The Permittee shall not release materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack at a source constructed or modified after November 1, 1982, unless approved in writing by the department.

[18 AAC 50.055(g), 1/18/97]

- 17. Open Burning.** The Permittee shall not conduct open burning at the facility.

[18 AAC 50.045(b), 1/18/97]
[18 AAC 50.065(a), 1/18/97]

- 18. Air Pollution Prohibited.** The Permittee shall not cause any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property.

[18 AAC 50.110, 5/26/72 & 18 AAC 50.350(d)(1), 1/18/97]

19. Monitoring, Record Keeping, and Reporting for Air Pollution Prohibited

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- 19.1 If emissions present a potential threat to human health or safety, the Permittee shall report any such emissions according to condition 37.
- 19.2 As soon as practicable after becoming aware of a complaint that is attributable to emissions from the facility, the Permittee shall investigate the complaint to identify emissions that the Permittee believes have caused or are causing a violation of condition 18.
- 19.3 The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if
- a. after an investigation because of a complaint or other reason, the Permittee believes that emissions from the facility have caused or are causing a violation of condition 18; or
 - b. the department notifies the Permittee that it has found a violation of condition 18.
- 19.4 The Permittee shall keep records of
- a. the date, time, and nature of all emissions complaints received;
 - b. the name of the person or persons that complained, if known;
 - c. a summary of any investigation, including reasons the Permittee does or does not believe the emissions have caused a violation of condition 18; and
 - d. any corrective actions taken or planned for complaints attributable to emissions from the facility.
- 19.5 With each facility operating report under condition 37, the Permittee shall include a brief summary report which must include
- a. the number of complaints received;
 - b. the number of times the Permittee or the department found corrective action necessary;
 - c. the number of times action was taken on a complaint within 24 hours; and
 - d. the status of corrective actions the Permittee or department found necessary that were not taken within 24 hours.
- 19.6 The Permittee shall notify the department of a complaint that is attributable to emissions from the facility within 24 hours after receiving the complaint, unless the Permittee has initiated corrective action within 24 hours of receiving the complaint.

[18 AAC 50.346(a)(2), 5/3/02]
[18 AAC 50.350(h) – (i), 1/18/97]

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- 20. Technology-Based Emission Standard.** If an unavoidable emergency, malfunction, or non-routine repair, as defined in 18 AAC 50.235, causes emissions in excess of a technology-based emission standard listed in condition 13, the Permittee shall take all reasonable steps to minimize levels of emissions that exceed the standard.

[18 AAC 50.235(a) & 18 AAC 50.350(f)(3), 1/18/97]

- 21. HAP Reconstruction.** Before replacing components of a major source of HAPS as that term is defined in 40 C.F.R. 63.2, or a source that would become a major source as a result of replacement, if the cost of replacement exceeds 50 percent of the fixed capital cost that would be required to construct a comparable new source, the Permittee shall obtain written approval from the department

21.1 under 40 C.F.R. 63.5(b)(3), (d), and (e), if the source is subject to an emission standard of 40 C.F.R. 63, or

21.2 in a Notice of MACT Approval under 40 C.F.R. 63.43(f) – (h), if the source is subject to 40 C.F.R. 63.43(a).

[18 AAC 50.345(b), 6/21/98; & 18 AAC 50.350(b)(3), 1/18/97]

- 22. Permit Renewal.** To renew this permit, the Permittee shall submit a complete application under 18 AAC 50.335 no sooner than February 24, 2006 and no later than February 26, 2007 to renew this permit.

[18 AAC 50.335(a), 1/18/97]

Section 9. General Source Testing and Monitoring Requirements

- 23. Requested Source Tests.** In addition to any source testing explicitly required by this permit, the Permittee shall conduct source testing as requested by the department to determine compliance with applicable permit requirements.

[18 AAC 50.220(a), 1/18/97 & 18 AAC 50.345(k), 5/3/02]

- 24. Operating Conditions.** Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing

24.1 At a point or points that characterize the actual discharge into the ambient air; and

24.2 At the maximum rated burning or operating capacity of the source or another rate determined by the department to characterize the actual discharge into the ambient air.

[18 AAC 50.220(b) & 18 AAC 50.350(g), 1/18/97]

- 25. Reference Test Methods.** The Permittee shall use the following as reference test methods when conducting source testing for compliance with this permit:

25.1 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(a) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60.

[18 AAC 50.040(a), 7/2/00, 18 AAC 50.220(c)(1)(A) & 18 AAC 50.350(g), 1/18/97]
[Federal Citation: 40 C.F.R. 60, 7/1/99]

25.2 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(b) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 61.

[18 AAC 50.040(b), 18 AAC 50.220(c)(1)(B) & 18 AAC 50.350(g), 1/18/97]
[Federal Citation: 40 C.F.R. 61, 12/19/96]

25.3 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(c) must be conducted in accordance with the source test methods and procedures specified in 40 C.F.R. 63.

[18 AAC 50.040(c), 7/2/00; 18 AAC 50.220(c)(1)(C) & 18 AAC 50.350(g), 1/18/97]
[Federal Citation: 40 C.F.R. 63, 7/1/99]

25.4 Source testing for the reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in Reference Method 9.

[18 AAC 50.030, 12/30/00; 18 AAC 50.220(c)(1)(D) & 18 AAC 50.350(g), 1/18/97]

25.5 Source testing for emissions of particulate matter, sulfur compounds, nitrogen compounds, carbon monoxide, lead, volatile organic compounds, fluorides, sulfuric acid mist, municipal waste combustor organics, metals, and acid gases must be conducted in accordance with the methods and procedures specified 40 C.F.R. 60, Appendix A.

[18 AAC 50.040(a)(4), 7/2/00 18 AAC 50.220(c)(1)(E) & 18 AAC 50.350(g), 1/18/97]
[Federal Citation: 40 C.F.R. 60, Appendix A, 7/1/99]

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- 25.6 Source testing for emissions of PM-10 must be conducted in accordance with the procedures specified in 40 C.F.R. 51, Appendix M.
[18 AAC 50.035, 7/2/00; 18 AAC 50.220(c)(1)(F) & 18 AAC 50.350(g), 1/18/97]
[Federal Citation: 40 C.F.R. 51, Appendix M, 7/1/99]
- 25.7 Source testing for emissions of any contaminant may be determined using an alternative method approved by the department in accordance with Method 301 in Appendix A to 40 C.F.R. 63.
[18 AAC 50.040(c), 7/2/00, 18 AAC 50.220(c)(2) & 18 AAC 50.350(g), 1/18/97]
[Federal Citation: 40 C.F.R. 63, Appendix A, Method 301, 7/1/99]
26. **Excess Air Requirements.** To determine compliance with this permit, standard exhaust gas volumes must only include the volume of gases formed from the theoretical combustion of fuel, plus the excess air volume normal for the specific source type, corrected to standard conditions (dry gas at 68 °F and an absolute pressure of 760 millimeters of mercury).
[18 AAC 50.220(c)(3) & 50.350(g), 1/8/97; 18 AAC 50.990(88), 5/3/02]
27. **Test Deadline Extension.** The Permittee may request an extension to a source test deadline established by the department. The Permittee may delay a source test beyond the original deadline only if the extension is approved in writing by the department's appropriate division director or designee.
[18 AAC 50.345(l), 5/3/02]
28. **Test Plans.** Before conducting any source tests, the Permittee shall submit a plan to the department. The plan must include the methods and procedures to be used for sampling, testing, and quality assurance, and must specify how the source will operate during the test and how the Permittee will document this operation. The Permittee shall submit a complete plan within 60 days of receiving a request under condition 23 and at least 30 days before the scheduled date of any test unless the department agrees in writing to some other time period. Retesting may be done without resubmitting the plan.
[18 AAC 50.350(b)(3) & 18 AAC 50.350(g), 1/18/97, 18 AAC 50.345(m), 5/3/02]
29. **Test Notification.** At least 10 days before conducting a source test, the Permittee shall give the department written notice of the date and the time the source test will begin.
[18 AAC 50.350(b)(3), 1/18/97, 18 AAC 50.345(n), 5/3/02]
30. **Test Reports.** Within 60 days after completing a source test, the Permittee shall submit two copies of the results, to the extent practical, in the format set out in the *Source Test Report Outline* of Volume III, Section IV.3 of the State Air Quality Control Plan, adopted by reference in 18 AAC 50.030. The Permittee shall certify the results as set out in condition 32. If requested in writing by the department, the Permittee must provide preliminary results in a shorter period of time specified by the department.
[18 AAC 50.350(b)(3), 18 AAC 50.350(h) – (i), 1/18/97, 18 AAC 50.345(o), 5/3/02]
31. **Particulate Matter Calculations.** In source testing for compliance with the particulate matter standards in conditions 5 and 9, the three-hour average is determined using the average of three one-hour test runs.
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Section 10. General Recordkeeping, Reporting, and Compliance Certification Requirements

- 32. Certification.** The Permittee shall certify all reports, compliance certifications, or other documents submitted to the department and required under the permit by including the signature of a responsible official for the permitted facility following the statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete." Excess emission reports must be certified either upon submittal or with an operating report required for the same operating period. All other reports and other documents must be certified upon submittal. When certifying a compliance certification, the official's signature must be notarized.

[18 AAC 50.205, 18 AAC 50.350(b)(3) & 18 AAC 50.350(i) 1/18/97, 18 AAC 50.345(j), 5/3/02]

- 33. Submittals.** Unless otherwise directed by the department or this permit, the Permittee shall send reports, compliance certifications, and other documents required by this permit to ADEC, Air Permits Program, 610 University Ave., Fairbanks, AK 99709-3643, ATTN: Compliance Technician.

[18 AAC 50.350(i), 1/18/97]

- 34. Information Requests.** The Permittee shall furnish to the department, within a reasonable time, any information the Department requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit or to determine compliance with the permit. Upon request, the Permittee shall furnish to the Department copies of records required to be kept by this permit. The Department may require the Permittee to furnish copies of those records directly to the federal administrator.

[18 AAC 50.200, 18 AAC 50.350(b)(3) & 18 AAC 50.350(g) – (i), 1/18/97, 18 AAC 50.345(i), 5/3/02]

- 35. Recordkeeping Requirements.** The Permittee shall keep all records required by this permit for at least five years after the date of collection, including

35.1 Copies of all reports and certifications submitted pursuant to this section of the permit.

35.2 Records of all monitoring required by this permit, and information about the monitoring including

- a. calibration and maintenance records, original strip chart or computer-based recordings for continuous monitoring instrumentation;
- b. sampling dates and times of sampling or measurements;
- c. the operating conditions that existed at the time of sampling or measurement;
- d. the date analyses were performed;
- e. the location where samples were taken;

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- f. the company or entity that performed the sampling and analyses;
 - g. the analytical techniques or methods used in the analyses; and
 - h. the results of the analyses.

[18 AAC 50.350(h), 1/18/97]

36. Excess Emission and Permit Deviation Reports. Except as provided in condition 18, the Permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows:

- a. in accordance with 18 AAC 50.240(c), as soon as possible after the event commences or is discovered, report
 - (i) emissions that present a potential threat to human health or safety; and
 - (ii) excess emissions that the Permittee believes to be unavoidable;
 - b. in accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or nonroutine repair that causes emissions in excess of a technology based emission standard;
 - c. report all other excess emissions and permit deviations
 - (i) within 30 days of the end of the month in which the emissions or deviation occurs, except as provided in conditions 36.c(ii) and 36.c(iii);
 - (ii) if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the department provides written permission to report under condition 36.c(i); and
 - (iii) for failure to monitor, as required in other applicable conditions of this permit.
- 36.1 When reporting excess emissions, the Permittee must report using either the department's on-line form, which can be found at www.dec.state.ak.us/awq/excess/report.asp, or, if the Permittee prefers, the form contained in Section 16 of this permit. The Permittee must provide all information called for by the form that is used.
- 36.2 When reporting a permit deviation, the Permittee must report using the form contained in Section 16 of this permit. The Permittee must provide all information called for by the form.
- 36.3 If requested by the department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.

[18 AAC 50.235(a)(2), 18 AAC 50.240(c) & 18 AAC 50.350(i), 1/18/97 & 18 AAC 50.346(a)(3), 5/3/02]

37. Operating Reports. During the life of this permit, the Permittee shall submit an original and two copies of an operating report by August 1 for the period January 1 to June 30 of the current year and by February 1 for the period July 1 to December 31 of the previous year.

37.1 The operating report must include all information required to be in operating reports by other conditions of this permit.

37.2 If excess emissions or permit deviations that occurred during the reporting period are not reported under condition 37.1, either

a. The Permittee shall identify

(i) the date of the deviation;

(ii) the equipment involved;

(iii) the permit condition affected;

(iv) a description of the excess emissions or permit deviation; and

(v) any corrective action or preventive measures taken and the date of such actions.

b. when excess emissions or permit deviations have already been reported under condition 36 the Permittee may cite the date or dates of those reports.

[18 AAC 50.350(d)(4), 18 AAC 50.350(f)(3) & 18 AAC 50.350(i), 1/18/97 & 18 AAC 50.346(b)(3), 5/3/02]

37.3 The operating report must include a listing of emissions monitored under conditions 47.2c and 50.2, which trigger additional testing or monitoring, whether or not the emissions monitored exceed an emission standard. The Permittee shall include in the report

a. the date of the emissions;

b. the equipment involved;

c. the permit condition affected; and

d. the monitoring result which triggered the additional monitoring.

[18 AAC 50.346(b)(3), 5/3/02]

38. Annual Compliance Certification. Each year by March 31, the Permittee shall compile and submit to the Department an original and two copies of a notarized annual compliance certification report as follows:

-
- 38.1 For each permit term and condition set forth in Section 3 through Section 13, including terms and conditions for monitoring, reporting, and recordkeeping:

[18 AAC 50.350(d)(4), 1/18/97 & 18 AAC 50.345(j), 5/3/02]

- a. certify the compliance status over the preceding calendar year consistent with the monitoring required by this permit;
- b. state whether compliance is intermittent or continuous; and
- c. briefly describe each method used to determine the compliance status; and
- d. notarize the responsible official's signature.

- 38.2 In addition, submit a copy of the report directly to the EPA-Region 10, Office of Air Quality, M/S OAQ-107, 1200 Sixth Avenue, Seattle, WA 98101.

[18 AAC 50.350(j), 1/18/97]

Section 11. Standard Conditions Not Otherwise Included in the Permit

- 39.** The Permittee must comply with each permit term and condition. Noncompliance with a permit term or condition constitutes a violation of AS 46.14, 18 AAC 50, and the Clean Air Act, except for those terms or conditions designated as not federally-enforceable, and is grounds for

39.1 an enforcement action,

39.2 permit termination, revocation and reissuance, or modification in accordance with AS 46.14.280; or

39.3 denial of an operating-permit renewal application.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(c), 5/3/02]

- 40.** It is not a defense in an enforcement action to claim that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with a permit term or condition.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(d), 5/3/02]

- 41.** Each permit term and condition is independent of the permit as a whole and remains valid regardless of a challenge to any other part of the permit.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(e), 5/3/02]

- 42.** Compliance with permit terms and conditions is considered to be compliance with those requirements that are

42.1 included and specifically identified in the permit, or

42.2 determined in writing in the permit to be inapplicable.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(b), 5/3/02]

- 43.** The permit may be modified, reopened, revoked and reissued, or terminated for cause. A request by the Permittee for modification, revocation and reissuance, or termination or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(f), 5/3/02]

- 44.** The permit does not convey any property rights of any sort, nor any exclusive privilege.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(g), 5/3/02]

- 45.** The Permittee shall allow the department or an inspector authorized by the department, upon presentation of credentials and at reasonable times with the consent of the owner or operator to

45.1 enter upon the premises where a source subject to the operating permit is located or where records required by the permit are kept,

45.2 have access to and copy any records required by the permit,

-
- 45.3 inspect any facility, equipment, practices, or operations regulated by or referenced in the permit; and
 - 45.4 sample or monitor substances or parameters to assure compliance with the permit or other applicable requirements.

[18 AAC 50.350(b)(3), 1/18/97 & 18 AAC 50.345(h), 5/3/02]

Section 12. Permit As Shield from Inapplicable Requirements

In accordance with AS 46.14.290, and based on information supplied in the facility application, this section of the permit contains the requirements determined by the department not to be applicable to the permitted facility.

- 46.** Table 2 and Table 3 identify the sources that are not subject to the specified requirements at the time of permit issuance. Some of the requirements listed below may become applicable during the permit term due to an invoking event, even though the requirement is deemed inapplicable at the time of permit issuance. The Permittee shall meet such requirements on a timely basis by submittal of a compliance schedule in accordance with 18 AAC 50.350(k).

Table 2. Source Specific Permit Shields Granted.

| SOURCE SPECIFIC | | |
|--|--|--|
| Non Applicable Requirements | Source ID | Reason for non-applicability |
| 18 AAC 50.055(a)(1) as amended through 1/18/97 | Source ID 4 | The only potential emissions as a result of tanker loading are VOCs. VOC emissions do not contribute significantly to opacity. |
| 18 AAC 50.055(b)(1) as amended through 1/18/97 | Source ID 4 | There are no particulate matter emissions as a direct result of tanker loading operations. |
| 18 AAC 50.055(c) as amended through 1/18/97 | Source ID 4 | There are no SO ₂ emissions as a direct result of tanker loading operations. |
| 40 CFR 60, Subpart K, Ka | 2,500 gal diesel (2) 5,000 gal diesel | Diesel is specifically exempt from the definition of petroleum liquid. |
| 40 CFR 60, Subpart Kb | 2,500 gal diesel (2) 5,000 gal diesel | Tanks are too small |

Table 3. Facility Wide Permit Shields Granted.

| FACILITY WIDE | |
|---|--|
| Non Applicable Requirements | Reason for non-applicability |
| 18 AAC 50.025 as amended through 1/18/97 | Facility is not in a special protection area |
| 18 AAC 50.050 as amended through 1/18/97 | Not this source category |
| 18 AAC 50.055(a)(2) – (a)(9) as amended through 1/18/97 | Not this source category |

| FACILITY WIDE | |
|---|--|
| Non Applicable Requirements | Reason for non-applicability |
| 18 AAC 50.055(b)(2)(A) - (b)(2)(C) as amended through 1/18/97 | Not this source category |
| 18 AAC 50.055(b)(3) - (b)(6) as amended through 1/18/97 | Not this source category |
| 18 AAC 50.055(d) - (f) as amended through 1/18/97 | Not this source category |
| 18 AAC 50.060 as amended through 1/18/97 | Not this source category |
| 18 AAC 50.065 as amended through 1/18/97 | No open burning is conducted at the Christy Lee Loading Platform. |
| 18 AAC 50.070 as amended through 1/18/97 | Tanker emissions are not considered to be emissions from the Drift River Facility. |
| 18 AAC 50.075 as amended through 1/18/97 | Not this source category |
| 18 AAC 50.085, 50.090, 0.300(g) as amended through 1/18/97 | Facility not located in this area |
| 18 AAC 50.330, 50.700-735 as amended through 1/18/97 | Not this source category |
| 18 AAC 50.900 as amended through 1/18/97 | Not a small business |
| 40 CFR 51 | Applies to states and jurisdictions |
| 40 CFR 52 | Administrative and jurisdictional |
| 40 CFR 53 | Not applicable to sources |
| 40 CFR 55 | Not this source category |
| 40 CFR 56 | Administrative and procedural |
| 40 CFR 57 | Not this source category |
| 40 CFR 58 | Applies to jurisdictions |
| 40 CFR 60, Subpart A | All sources at this facility subject to a NSPS are specifically exempt from Subpart A. |
| 40 CFR 60, Subpart AA, AAa, AAA, B, BB, BBB, C, Cc, Cb, CC, Cd, DD, DDD, E, Ea, Eb, EE, F, FFF, G, GG, GGG, H, HH, HHH, I, III, J, JJJ, KK, KKK, L, LL, LLL, M, MM, N, Na, NN, NNN, O, OOO, P, PP, PPP, Q, QQ, QQQ, R, RR, RRR, S, SS, SSS, T, TT, TTT, U, UU, UUU, V, VV, VVV, W, WW, WWW, X, XX, Y, Z | Not this source category |

| FACILITY WIDE | |
|---|---|
| Non Applicable Requirements | Reason for non-applicability |
| 40 CFR 61.142, 61.144, 61.146, 61.147, 61.149, 61.151, 61.153, 61.154, 61.155, 61.157 | Not this source category |
| 40 CFR 62 | Administrative and jurisdictional |
| 40 CFR 63, Subpart Y | The marine tank vessel loading operations are at an existing offshore loading terminal (as defined in 63.561). Per survey documented in November 6, 1994 letter, the closest distance to the line of Mean Lower Low Water is 3,570 feet. As stated In 40 CFR 63.560(d)(6), the subpart does not apply to existing offshore loading terminals. |
| 40 CFR 67 | Administrative and jurisdictional |
| 40 CFR 69 | Source located within the 50 states |
| 40 CFR 72 | All potential affected units commenced operation before 11/15/90. |
| 40 CFR 73, 75, 77 | No affected units at the facility |
| 40 CFR 78, 79, 80, 81, 85, 86, 87, 88 | Administrative and jurisdictional |

Section 13. Visible Emissions and PM Monitoring, Recordkeeping and Reporting

For Liquid-Fired Sources (Source IDs 1 - 3)

- 47. Visible Emissions Monitoring.** The Permittee shall observe the exhaust of Source(s) 1 - 3 for visible emissions using either the Method 9 Plan under condition 47.1 or the Smoke/No-Smoke Plan under condition 47.2. The Permittee may change visible-emissions plans for a source at any time unless prohibited from doing so by condition 47.3.

47.1 Method 9 Plan. For all 18-minute observations in this plan, observe exhaust, following 40 C.F.R. 60, Appendix A-4, Method 9, adopted by reference in 18 AAC 50.040(a), for 18 minutes to obtain 72 consecutive 15-second opacity observations.

- a. First Method 9 Observation. Observe exhaust for 18 minutes within six months after the issue date of this permit or within 14 calendar days after changing from the Smoke/No-Smoke Plan of condition 47.2, whichever is later.
- b. Monthly Method 9 Observations. After the first Method 9 observation, perform 18-minute observations at least once in each calendar month that a source operates.
- c. Semiannual Method 9 Observations. After observing emissions for three consecutive operating months under condition 47.1b, unless a six-minute average is greater than 15 percent and one or more observations are greater than 20 percent, observe emissions at least semiannually for 18 minutes.

Semiannual observations must be taken between four and seven months after the previous set of observations.

- d. Annual Method 9 Observations. After at least two semiannual 18-minute observations, unless a six-minute average is greater than 15 percent and one or more individual observations are greater than 20 percent, observe emissions at least annually.

Annual observations must be taken between 10 and 13 months after the previous observations and must include at least three 18-minute sets of observations.

- e. Increased Method 9 Frequency. If a six-minute average opacity is observed during the most recent set of observations to be greater than 15 percent and one or more observations are greater than 20 percent, then increase or maintain the 18-minute observation frequency for that source to at least monthly intervals, until the criteria in condition 47.1c for semiannual monitoring are met.

47.2 Smoke/No Smoke Plan. Observe the exhaust for the presence or absence of visible emissions, excluding condensed water vapor.

-
- a. Initial Monitoring Frequency. Observe the exhaust during each calendar day that a source operates.
 - b. Reduced Monitoring Frequency. After the source has been observed on 30 consecutive operating days, if the source operated without visible smoke in the exhaust for those 30 days, then observe emissions at least once in every calendar month that a source operates.
 - c. Smoke Observed. If smoke is observed, either begin the Method 9 Plan of condition 47.1 or perform the corrective action required under condition 47.3

47.3 Corrective Actions Based on Smoke/No Smoke Observations. If visible emissions are present in the exhaust during an observation performed under the Smoke/No Smoke Plan of condition 47.2, then the Permittee shall either follow the Method 9 plan of condition 47.1; or

- a. initiate actions to eliminate smoke from the source within 24 hours of the observation;
- b. keep a written record of the starting date, the completion date, and a description of the actions taken to reduce smoke; and
- c. after completing the actions required under condition 47.3a,
 - (i) take Smoke/No Smoke observations in accordance with condition 47.2
 - (A) at least once per day for the next seven operating days and until the initial 30 day observation period is completed; and
 - (B) continue as described in condition 47.2b; or
 - (ii) if the actions taken under condition 47.3a do not eliminate the smoke, or if subsequent smoke is observed under the schedule of condition 47.3c(i)(A), then observe the exhaust using the Method 9 Plan unless the department gives written approval to resume observations under the Smoke/No Smoke Plan; after observing smoke and making observations under the Method 9 Plan, the Permittee may at any time take corrective action that eliminates smoke and restart the Smoke/No Smoke Plan under condition 47.2a.

48. Visible Emissions Record Keeping. The Permittee shall keep records in accordance with this condition 48.

48.1 If using the Method 9 Plan of condition 47.1,

- a. the observer shall record

-
- (i) the name of the facility, emissions source and location, facility type, observer's name and affiliation, and the date on the Visible Emissions Field Data Sheet in Section 14;
 - (ii) the time, estimated distance to the emissions location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), plume background, and operating rate (load or fuel consumption rate) on the sheet at the time opacity observations are initiated and completed;
 - (iii) the presence or absence of an attached or detached plume and the approximate distance from the emissions outlet to the point in the plume at which the observations are made;
 - (iv) opacity observations to the nearest five percent at 15-second intervals on the Visible Emissions Observation Record in Section 14; and
 - (v) the minimum number of observations required by the permit; each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period.
- b. to determine the six-minute average opacity, divide the observations recorded on the record sheet into sets of 24 consecutive observations; sets need not be consecutive in time and in no case shall two sets overlap; for each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24; record the average opacity on the sheet;
 - c. calculate and record the highest 18-consecutive-minute average observed.
- 48.2 If using the Smoke/No Smoke Plan of condition 47.2, record the following information in a written log for each observation and submit copies of the recorded information upon request of the department:
- a. the date and time of the observation;
 - b. from Table 1 in Section 4, the ID of the source observed;
 - c. whether visible emissions are present or absent in the exhaust;
 - d. a description of the background to the exhaust during the observation;
 - e. if the source starts operation on the day of the observation, the startup time of the source;
 - f. name and title of the person making the observation; and
 - g. operating rate (load or fuel consumption rate).
-

49. Visible Emissions Reporting. The Permittee shall report visible emissions as follows:

49.1 include in each facility operating report under condition 37:

- a. which visible-emissions plan of condition 47 was used for each source; if more than one plan was used, give the time periods covered by each plan;
- b. for each source under the Method 9 Plan,
 - (i) copies of the observation results (i.e. opacity observations) for each source that used the Method 9 Plan, except for the observations the Permittee has already supplied to the department; and
 - (ii) a summary to include:
 - (A) number of days observations were made;
 - (B) highest six-minute average observed; and
 - (C) dates when one or more observed six-minute averages were greater than 20 percent;
- c. for each source under the Smoke/No Smoke Plan, the number of days that Smoke/No Smoke observations were made and which days, if any, that smoke was observed; and
- d. a summary of any monitoring or record keeping required under conditions 47 and 48 that was not done;

49.2 report under condition 36:

- a. the results of Method 9 observations that exceed an average 20 percent for any six-minute period; and
- b. if any monitoring under condition 47 was not performed when required, report within three days of the date the monitoring was required.

[18 AAC 50.350(g) – (i), 1/18/97; 18 AAC 50.346(c), 5/3/02]

50. Particulate Matter Monitoring for Diesel Engines. The Permittee shall conduct source tests on diesel engines, Source ID(s) 1 - 3 to determine the concentration of particulate matter (PM) in the exhaust of a source in accordance with this condition 50.

50.1 Within six months of exceeding the criteria of condition 50.2a or 50.2b, either

- a. conduct a PM source test according to conditions 25 - 30; or

-
- b. make repairs so that emissions no longer exceed the criteria of condition 50.2; to show that emissions are below those criteria, observe emissions as described in condition 47.1 under load conditions comparable to those when the criteria were exceeded.

50.2 Conduct the test according to condition 50.1 if

- a. 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity greater than 20 percent; or
- b. for a source with an exhaust stack diameter that is less than 18 inches, 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity that is greater than 15 percent and not more than 20 percent, unless the department has waived this requirement in writing.

50.3 During each one-hour PM source test run, observe the exhaust for 60 minutes in accordance with Method 9, and calculate the average opacity that was measured during each one hour test run. Submit a copy of these observations with the source test report.

50.4 The automatic PM source test requirement in condition 50.1 and 50.2 is waived for an emissions unit if a PM source test on that unit has shown compliance with the PM standard during this permit term.

51. Particulate Matter Reporting for Diesel Engines. The Permittee shall report as follows:

51.1 report under condition 36:

- a. the results of any PM source test that exceeds the PM emissions limit; or
- b. if one of the criteria of condition 50.2 was exceeded and the Permittee did not comply with either condition 50.1a or 50.1b, this must be reported by the day following the day compliance with condition 50.1 was required;

51.2 report observations in excess of the threshold of condition 50.2b within 30 days of the end of the month in which the observations occur;

51.3 in each facility operating report under condition 37, include

- a. the dates, source ID(s), and results when an observed 18-minute average was greater than an applicable threshold in condition 50.2;
- b. a summary of the results of any PM testing under condition 50; and
- c. copies of any visible emissions observation results (opacity observations) greater than the thresholds of condition 50.2, if they were not already submitted.

[18 AAC 50.350(g) – (i), 1/18/97; 18 AAC 50.346(c), 5/3/02]

- 52.** The Permittee is not required to comply with conditions 28, 29, and 30 (Test Plans, Test Notifications and Test Reports) when the exhaust is observed for visible emissions under the Method 9 Plan or Smoke/No Smoke Plan described in conditions 47.1 and 47.2.

[18 AAC 50.345(a), 5/3/02]

Section 14. Visible Emissions Forms

Visible Emissions Field Data Sheet

Certified Observer: _____

Company: _____

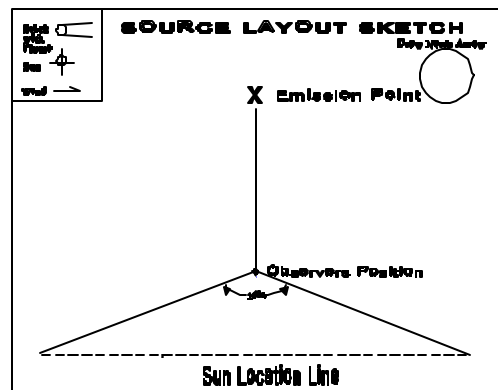
Location: _____

Test No.: _____ Date: _____

Source: _____

Production Rate, Operating Rate &
Unit Operating Hours: _____

Hrs. of observation: _____



| Clock Time | Initial | | | | Final |
|---|---------|--|--|--|-------|
| Observer location | | | | | |
| Distance to discharge | | | | | |
| Direction from discharge | | | | | |
| Height of observer point | | | | | |
| Background description | | | | | |
| Weather conditions | | | | | |
| Wind Direction | | | | | |
| Wind speed | | | | | |
| Ambient Temperature | | | | | |
| Relative humidity | | | | | |
| Sky conditions: (clear, overcast, % clouds, etc.) | | | | | |
| Plume description: | | | | | |
| Color | | | | | |
| Distance visible | | | | | |
| Water droplet plume? (Attached or detached?) | | | | | |
| Other information | | | | | |

Visible Emissions Observation Record

Page ____ of ____

Company _____ Certified Observer _____

Test Number _____ Clock time _____

[illegible]

Additional information:

Observer Signature

Data Reduction:

Duration of Observation Period (minutes) _____

Number of Observations _____

Number of Observations exceeding 20% _____

Average Opacity Summary

| Set Number | Time Start—End | Opacity | |
|---------------|-------------------|---------|---------|
| | | Sum | Average |
| | | | |
| | | | |
| | | | |

Section 15. Material Balance Calculation

If the sulfur content of any fuel combusted is greater than 0.75% by weight, calculate the three-hour exhaust concentration of SO₂ using the following equations:

$$A = 31,200 \times [\text{wt}\%S_{\text{fuel}}] = 31,200 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$B = 0.148 \times [\text{wt}\%S_{\text{fuel}}] = 0.148 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$C = 0.396 \times [\text{wt}\%C_{\text{fuel}}] = 0.396 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$D = 0.933 \times [\text{wt}\%H_{\text{fuel}}] = 0.933 \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$E = B + C + D = \underline{\hspace{2cm}} + \underline{\hspace{2cm}} + \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$F = 20.9 - [\text{vol}\%_{\text{dry}}O_{2,\text{exhaust}}] = 20.9 - \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$G = [\text{vol}\%_{\text{dry}}O_{2,\text{exhaust}}] \div F = \underline{\hspace{2cm}} \div \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$H = 1 + G = 1 + \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$I = E \times H = \underline{\hspace{2cm}} \times \underline{\hspace{2cm}} = \underline{\hspace{2cm}}$$

$$\text{SO}_2 \text{ concentration} = A \div I = \underline{\hspace{2cm}} \div \underline{\hspace{2cm}} = \underline{\hspace{2cm}} \text{ PPM}$$

The **wt%*S*_{fuel}**, **wt%*C*_{fuel}**, and **wt%*H*_{fuel}** are equal to the weight percents of sulfur, carbon, and hydrogen in the fuel. These percentages should total 100%.

The fuel weight percent (wt%) of sulfur is obtained pursuant to condition 6.1. The fuel weight percents of carbon and hydrogen are obtained from the fuel refiner.

The volume percent of oxygen in the exhaust (**vol%*O*_{2,exhaust}**) is obtained from oxygen meters, manufacturer's data, or from the most recent analysis under 40 C.F.R. 60, Appendix A-2, Method 3, adopted by reference in 18 AAC 50.040(a), at the same engine load used in the calculation.

Enter all of the data in percentages without dividing the percentages by 100. For example, if **wt%*S*_{fuel}** = 1.0%, then enter 1.0 into the equations not 0.01 and if **vol%*O*_{2,exhaust}** = 3.00%, then enter 3.00, not 0.03.

[18 AAC 50.350(g), 1/18/97 & 18 AAC 50.346(c), 5/3/02]

Section 16. ADEC Notification Form

Fax this form to: (907) 269-7508 Telephone: (907) 269-8888

Cook Inlet Pipe Line Company

Company Name

Christy Lee Loading Platform

Facility Name

1. Reason for notification:☐ **Excess Emission**☐ **Permit Condition Deviation****2. Event Information (Use 24-hour clock):****START Time:****END Time:****Duration**

(hr:min):

Date: _____ : _____ : _____

Date: _____ : _____ : _____

Total: _____ : _____**3. Cause of Event (Check all that apply):**☐ **START UP**☐ **UPSET CONDITION**☐ **CONTROL EQUIPMENT**☐ **SHUT DOWN**☐ **SCHEDULED MAINTENANCE**☐ **OTHER** _____*Attach a detailed description of what happened, including the parameters or operating conditions exceeded.***4. Sources Involved:***Identify each Emission Source involved in the event, using the same identification number and name as in the Permit. List any Control Device or Monitoring System affected by the event.**Attach additional sheets as necessary.*

Source ID No. Source Name Description Control Device

_____**5. Emission Limit Exceeded and/or Permit Condition Deviation:***Identify each Emission Standard and Permit Condition potentially exceeded during the event. Attach a list of ALL known or suspected injuries or health impacts. Attach additional sheets as necessary.*

Permit Condition Limit Exceedance

_____**6. Emission/Deviation Reduction:***Attach a description of the measures taken to minimize and/or control emissions or permit condition deviations during the event.***7. Corrective Actions:***Attach a description of corrective actions taken to restore the system to normal operation and to minimize or eliminate chances of a recurrence.*

Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete.

Printed Name: _____

Signature: _____

Date: _____

Alaska Department of Environmental Conservation

Air Permits Program

July 24, 2002

Cook Inlet Pipe Line Company

Christy Lee Loading Platform

**LEGAL AND FACTUAL BASIS
of the terms and conditions for
Permit No. 189TVP01**

Prepared by Cynthia Espinoza

INTRODUCTION

This document sets forth the legal and factual basis for the terms and conditions of Operating Permit No. 189TVP01.

The Christy Lee Loading Platform is used for loading ships (tankers) with crude oil from Drift River Terminal. The facility is owned and operated by Cook Inlet Pipe Line Company. Cook Inlet Pipe Line Company is the Permittee for the facility's operating permit.

PROCESS DESCRIPTION

As provided in the application, two 30-inch underground/underwater pipelines connect Drift River with the Christy Lee. Pressure for pumping liquids is supplied by pumps at Drift River. These pipelines transfer crude oil to tankers moored at the Christy Lee. These pipelines also transfer ballast water to the ballast water treatment (BWT) plant.

Sources of air pollutants at Christy Lee Loading Platform include diesel-fired generators, and the tanker loading operations that release VOCs from the crude oil as it is loaded on the tanker. In addition, VOCs remaining from the previous cargo are displaced when the crude oil is loaded on the tanker.

The sources at the facility regulated in Operating Permit 189TVP01 are identified in Table 1 in Section 4 of the permit.

SOURCE INVENTORY AND DESCRIPTION

Section 4 of Operating Permit No. 189TVP01 contains Table 1 describing the sources regulated by the permit. The table is provided for information and identification purposes only. Specifically, the source rating/size provided in the table is not intended to create an enforceable limit.

EMISSIONS

Table 1. Emissions Summary

| Pollutant | NO _x | CO | PM-10 | SO ₂ | VOC | HACs |
|--|-----------------|------|-------|-----------------|-------|-------|
| Potential Emissions (TPY) per AS 46.14.990(21) | 31.4 | 6.76 | 2.2 | 3.68 | 5,837 | 377.8 |
| Assessable Potential to Emit (TPY) under condition 2.1 | 31.4 | 0 | 0 | 0 | 5,837 | 0 |

The Permittee provided in the application the potential emissions. The Permittee used emission factors from AP-42 to calculate potential to emit criteria pollutant, hazardous air contaminants, and 0.5% by weight sulfur content for diesel.

The assessable potential to emit is simply those regulated air contaminants for which the facility has the potential to emit quantities greater than 10 tons per year; and does not include hazardous air contaminants.

BASIS FOR REQUIRING AN OPERATING PERMIT

Christy Lee Loading Platform requires an operating permit under 18 AAC 50.325(b)(1) because it has the potential to emit 100 tons per year (tpy) or more of a regulated air contaminant; under 18 AAC 50.325(b)(2) because it has the potential to emit 10 tpy or more of any single hazardous air contaminant or 25 tpy or more in the aggregate of two or more hazardous air contaminants. Christy Lee Loading Platform meets the definition of operating permit facility in the state regulations at Section 2.

Christy Lee Loading Platform is also a Prevention of Significant Deterioration (PSD) Major Facility as defined in 18 AAC 50.300(c)(1) because it has the potential to emit more than 250 tpy of a regulated air contaminant in an area classified as attainment or unclassifiable. However, Christy Lee Loading Platform has never undergone a PSD review because the facility was in full operation before 1977.

This facility is also classified as a hazardous air contaminant major facility under 18 AAC 50.300(f) because emits or has the potential to emit 10 tpy or more of any single hazardous air contaminant or 25 tpy or more in the aggregate of two or more hazardous air contaminants.

Christy Lee Loading Platform was modified in 1997, with the like and kind replacement of the three platform generators. This modification did not trigger PSD levels in 18 AAC 50.300(h)(3)(B). However, the increase in potential emissions due to the replacement counts against the PSD thresholds, see PSD account in Table 2.

Alaska regulations require operating permit applications to include identification of “regulated sources.” As applied to Christy Lee Loading Platform, the state regulations require a description of:

Each incinerator, including a demonstration showing each requirement in 18 AAC 50.050, Incinerator Emissions Standards, that applies [18 AAC 50.335(e)(4)(A)];

Each source regulated by a standard in 18 AAC 50.055, Industrial Processes and Fuel Burning Equipment [18 AAC 50.335(e)(4)(C)];

Each source subject to a standard adopted by reference in 18 AAC 50.040 [18 AAC 50.335(e)(2)]; and

Sources subject to requirements in an existing DEC permit [18 AAC 50.335(e)(5)]

The emission sources at Christy Lee Loading Platform classified as “regulated sources” according to the above DEC regulations are listed in Table 1 of Permit No. 189TVP01.

CURRENT AIR QUALITY PERMITS

Previous Air Quality Permit to Operate

No previous air quality control permit-to-operate exists for this facility.

Construction Permits

No construction permits have been issued for this facility after January 18, 1997 (the effective date of the new divided operating and construction-permitting program).

Title-V Operating Permit Application History

The owner or operator submitted an application on November 26, 1997.

The owner or operator amended this application on March 5, 2001.

COMPLIANCE HISTORY

The facility has operated at its current location since 1966 and does not have previous operating permits. Review of the past 3 years facility operating reports for this facility, indicate a facility generally operating in compliance with its permit application.

LEGAL AND FACTUAL BASIS FOR THE PERMIT CONDITIONS

Conditions 1 - 3, Fee Requirements

Legal Basis: [18 AAC 50.350(c) & 18 AAC 50.400 – 420, 1/18/97]

The regulations require all permits to include due dates for the payment of fees and any method the Permittee may use to re-compute assessable emissions.

Factual Basis: These conditions require the Permittee to pay fees in accordance with the department's billing regulations. The department's billing regulations set the due dates for payment of fees based on the billing date.

The conditions also set forth how the Permittee may recompute assessable emissions. If the Permittee does not choose to annually calculate assessable emissions, emissions fees may be paid based on “potential to emit.”

Table 2 is a PSD account to show the potential emissions available to Christy Lee Loading Platform after the like and kind replacement of Source IDs 1 - 3 (generators) in 1997.

Table 2. Christy Lee Loading Platform Available Emissions in Tons per Year

| | | Tons per Year | | | | |
|------------------------------|--|-----------------------|------------|--------------|-------------|-----------------------|
| | | NO_x | CO | PM-10 | VOC | SO_x |
| Christy Lee Loading Platform | Actual Emissions before replacement of three generators | 10.5 | 2.3 | 0.7 | 0.8 | 0.6 |
| | Potential Emissions after replacement, 1997 | 31.4 | 6.7 | 2.2 | 2.49 | 3.68 |
| | <i>Increase</i> | <i>20.9</i> | <i>4.4</i> | <i>1.5</i> | <i>1.69</i> | <i>3.08</i> |
| Drift River Terminal | Potential Emissions after installation of air stripper, 1992 | 0 | 0 | 0 | 4.4 | 0 |
| | <i>Increase</i> | <i>0</i> | <i>0</i> | <i>0</i> | <i>4.4</i> | <i>0</i> |
| <i>Aggregated</i> | Total Increase | 20.9 | 4.4 | 1.5 | 6.09 | 3.08 |
| Aggregated | Potential to Emit Available | 19.1 | 95.6 | 13.5 | 33.9 | 36.9 |

Condition 4, Visible Emissions

Legal Basis: [18 AAC 50.055(a)(1), 1/18/97]
 [18 AAC 50.350(d), 6/21/98]
 [18 AAC 50.350(g) – (i), 1/18/97]
 [18 AAC 50.055(a)(1), 5/3/02]
 [18 AAC 50.346(c), 5/3/02]

This regulation applies to operation of all fuel-burning equipment in Alaska.

Factual basis: Condition 4 requires the Permittee to comply with the federal and the state visible emission standards applicable to fuel-burning equipment and incinerators. The Permittee shall not cause or allow the equipment to violate these standards.

This condition has recently been adopted into regulation as a standard condition.

Gas Fired:

Monitoring – The monitoring of gas fired sources for visible emissions is waived, i.e. no source testing will be required. The department has found that natural gas fired equipment inherently has negligible PM emissions. However, the department can request a source test for PM emissions from any smoking equipment.

Reporting – The Permittee must annually certify that only gaseous fuels are used in the equipment.

Liquid Fired:

Monitoring – The visible emissions may be observed by either Method-9 or the Smoke/No Smoke plans as detailed in Section 13. Corrective actions such as maintenance procedures and either more frequent or less frequent testing may be required depending on the results of the observations.

Recordkeeping - The Permittee is required to record the results of all visible emission observations and record any actions taken to reduce visible emissions.

Reporting - The Permittee is required to report: 1) emissions in excess of the federal and the state visible emissions standard, 2) and deviations from permit conditions. The Permittee is required to include copies of the results of all visible emission observations with the facility operating report.

Condition 5, Particulate Matter

Legal Basis: [18 AAC 50.055(b)(1), 1/18/97]
[18 AAC 50.350(d), 6/21/98]
[18 AAC 50.350(g) – (i), 1/18/97]
[18 AAC 50.346(c), 5/3/02]

This regulation applies to operation of all fuel-burning equipment in the State of Alaska.

Factual basis: Condition 5 requires the Permittee to comply with the state PM (also called grain loading) standard applicable to fuel-burning equipment. The Permittee shall not cause or allow fuel-burning equipment to violate this standard.

This condition has recently been adopted into regulation as a standard condition.

Gas Fired:

Monitoring – The monitoring of gas fired sources for particulate matter is waived, i.e. no source testing will be required. The department has found that natural gas fired equipment inherently has negligible PM emissions. However, the department can request a source test for PM emissions from any smoking equipment.

Reporting – The Permittee must annually certify that only gaseous fuels are used in the equipment.

Liquid Fired:

Monitoring – The Permittee is required to conduct PM source testing if threshold values for opacity are exceeded.

Recordkeeping - The Permittee is required to record the results of PM source tests.

Reporting - The Permittee is required to report: 1) incidents when emissions in excess of the opacity threshold values have been observed, 2) and results of PM source tests. The Permittee is required to include copies of the results of all visible emission observations with the facility operating report.

Condition 6, Sulfur Compound Emissions

Legal Basis: [18 AAC 50.055(c), 1/18/97]
[18 AAC 50.350(d)(1)(C), 6/21/98]
[18 AAC 50.350(g) – (i), 1/18/97]
[18 AAC 50.410(c), 1/18/97]
[18 AAC 50.346(c), 5/3/02]

This condition applies to operation of all fuel-burning equipment in the State of Alaska.

Factual basis: The condition reiterates a sulfur emission standard applicable to fuel-burning equipment. The Permittee may not cause or allow their equipment to violate this standard.

Sulfur dioxide comes from the sulfur in the liquid, hydrocarbon fuel (e.g. diesel or No. 2 fuel oil). Fuel containing no more than 0.5% sulfur by weight will always comply with the emission standard. For fuels with a sulfur content higher than 0.75%, the condition requires the Permittee to use Section 15 to calculate the sulfur-dioxide concentration using the equations to show that the standard is not exceeded.

Fuel sulfur testing will verify compliance.

Condition 7, Facility Wide Requirements

Legal Basis: [18 AAC 50.990(37), 1/18/97]
[18 AAC 50.910, 1/18/97]

Factual basis: The aggregated potential emissions are the potential emissions from all sources installed after August 7, 1980 at Christy Lee Loading Platform and the Drift River Terminal. The aggregation is for the purpose of determining applicability with the modification requirements of 18 AAC 50.300(h)(3).

Conditions 8 - 10, Insignificant Sources

Legal Basis: [18 AAC 50.050(a)(2), 1/18/97]
[18 AAC 50.055(a)(1), 1/18/97]
[18 AAC 50.055(b)(1), 1/18/97]
[18 AAC 50.055(c), 1/18/97]

Factual basis: These are general emission standards which apply to all industrial processes fuel-burning equipment, and incinerators regardless of size. The conditions reiterate the general standards and require compliance for insignificant sources. The Permittee may not cause or allow their equipment to violate these standards. Insignificant sources are not listed in the permit unless specific monitoring, recordkeeping and reporting are necessary to ensure compliance.

The department finds that the insignificant sources at this facility do not need specific monitoring, recordkeeping and reporting to ensure compliance.

Condition 11, Insignificant Sources Compliance Certification

Legal Basis: [18 AAC 50.350(m)(3), 9/4/98]

Factual Basis: The regulations require the Permittee to certify that their insignificant sources comply with applicable requirements. The condition restates the regulatory requirement.

Condition 12, Asbestos NESHAP

Legal Basis: [18 AAC 50.040(b)(3) & 18 AAC 50.350(d)(1), 1/18/97]

[Federal Citation: 40 C.F.R. 61, Subpart M, 12/19/96]

If the Permittee engages in asbestos demolition and renovation, then these requirements may apply.

Factual Basis: The condition cites and requires compliance with the regulations that will apply if the Permittee engages in asbestos demolition or renovation. Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient.

Condition 13, Refrigerant Recycling and Disposal

Legal Basis: [18 AAC 50.040(d) & 18 AAC 50.350(d)(1), 1/18/97]

[Federal Citation: 40 C.F.R. 82, Subpart F, 7/1/97]

Factual Basis: The condition cites and requires compliance with the regulations that will apply if the Permittee uses certain refrigerants. Because these regulations include adequate monitoring and reporting requirements and because the Permittee is not currently engaged in such activity, simply citing the regulatory requirements is sufficient.

Condition 14, Good Air Pollution Control Practice

Legal Basis: [18 AAC 50.346(b)(2), 5/3/02]

Factual basis: The condition requires the Permittee to comply with good air pollution control practices for all sources.

Maintaining and operating equipment in good working order is fundamental to preventing unnecessary or excess emissions. Standard conditions for monitoring compliance with emission standards are based on the assumption that good maintenance is performed. Without appropriate maintenance, equipment can deteriorate more quickly than with appropriate maintenance. If appropriate maintenance is not applied to the equipment, the Department may have to apply more frequent periodic monitoring requirements (unless the monitoring is already continuous) to ensure that the monitoring results are representative of actual emissions.

The Permittee is required to keep maintenance records to show that proper maintenance procedures were followed, and to make the records available to the Department. The Department may use these records as a trigger for requesting source testing if the records show that maintenance has been deferred.

Condition 15, Dilution

Legal Basis: [18 AAC 50.045(a), 1/18/97]

Factual Basis: The requirement prohibits diluting emissions as a means of compliance. In practical terms, dilution only affects compliance when the emissions are being measured. Careful reviews of source test plans and operating conditions should reveal any dilution as a result of the introduction of non-process air into the exhaust.

Condition 16, Stack Injection

Legal Basis: [18 AAC 50.055(g) & 18 AAC 50.310(m), 1/18/97]

Applies to the facility because the facility contains a stack or source modified after November 1, 1982.

Factual Basis: The condition restates the prohibition on stack injection (i.e. disposing of material by injecting it into a stack). No specific monitoring for this condition is practical. Compliance is ensured by inspections, because the source or stack would need to be modified to accommodate stack injection.

Condition 17, Open Burning

Legal Basis: [18 AAC 50.045(b), 1/18/97]

[18 AAC 50.065(a), 1/18/97]

Factual Basis: This condition prohibits the Permittee to conduct open burning at the facility.

The Permittee indicated in the Title V application that no open burning is conducted at Christy Lee Loading Platform. In addition, the Permittee requested a shield from 18 AAC 50.065, which is open burning.

Condition 18, Air Pollution Prohibited

Legal Basis: [18 AAC 50.346(a)(2), 5/3/02]

[18 AAC 50.040(e), 7/2/00]

[18 AAC 50.110, 5/26/72]

[18 AAC 50.350(g) – (i), 1/18/97]

Applies to the facility because the facility will have emissions.

Factual Basis: The condition restates the general prohibition on injurious air emissions, which applies to any emissions from the facility. While the other permit conditions and emissions limitation should ensure compliance with this condition, unforeseen emission impacts can violate this standard. These violations would go undetected except for complaints from affected persons. Therefore, to monitor compliance, the Permittee must monitor and respond to complaints.

The Permittee is to report any complaints and injurious emissions. The plant does not handle any large quantities of hazardous air pollutants. The Permittee must keep records of the date,

time, and nature of all complaints received and summary of the investigation and corrective actions undertaken for these complaints and to submit copies of these records upon request of the department.

Condition 20, Technology-Based Emission Standard

Legal Basis: [18 AAC 50.235(a) & 18 AAC 50.350(f), 1/18/97]

Applies to the facility because the facility contains equipment subject to a technology-based emission standard.

Factual Basis: This condition restates a regulation that requires the Permittee to take reasonable steps to minimize emissions if certain activity causes exceedance of a technology-based emission standard. Because the technology-based emission standard itself is a condition of the permit, the Permittee will report the excess emissions under condition 36. Because the excess emission report requires information on the steps taken to minimize emissions, this report is adequate monitoring for compliance with this condition.

Condition 21, HAP Reconstruction

Legal Basis: [18 AAC 50.345(b), 6/21/98]

[18 AAC 50.350(b)(3), 1/18/97]

Applies to the facility because the facility is a hazardous air contaminant major facility as described in 18 AAC 50.300(f).

Factual Basis: The Permittee must obtain written approval from the department before reconstructing a HAP-major source. Pre-construction approval for reconstructing a HAP major source is a requirement of the Clean Air Act. Alaska's construction permit program does not require a construction permit for reconstructing a source, only for reconstructing a facility. Therefore, this condition is a standard condition in all hazardous air contaminant major facility operating permits.

Condition 22, Permit Renewal

Legal Basis: [18 AAC 50.335(a), 1/18/97]

Applies if the Permittee intends to renew the permit.

Factual Basis: The condition restates the regulatory deadlines, citing the specific dates applicable to the facility. Submittal of the renewal application is sufficient monitoring, recordkeeping and reporting.

Condition 23, Requested Source Tests

Legal Basis: [18 AAC 50.220(a) & 18 AAC 50.345(a)(10), 1/18/97]

Standard condition to be included in all permits.

Factual Basis: Condition requires the Permittee to conduct source tests as requested by the department, therefore no monitoring is needed. Conducting the requested source test is its own monitoring.

Conditions 24 - 26, General Source Testing and Monitoring Requirements

Legal Basis: [18 AAC 50.030, 12/30/00]
[18 AAC 50.035, 7/2/00]
[18 AAC 50.040(a)(b)(c)(d) & (e), 1/18/97 & 7/2/00]
[18 AAC 50.220(b) – (c), 1/18/97]
[18 AAC 50.350(g), 1/18/97]
[18 AAC 50.990(88), 1/18/97]
[Federal Citation: 40 C.F.R. 51, Appendix M, 7/1/99]
[Federal Citation: 40 C.F.R. 60, 7/1/99]
[Federal Citation: 40 C.F.R. 61, 12/19/96]
[Federal Citation: 40 C.F.R. 63, 7/1/99]

Applies when the Permittee is required to conduct a source test.

Factual Basis: These conditions restate regulatory requirements for source testing. As such, they supplement the specific monitoring requirements stated elsewhere in this permit. The tests reports required by later conditions adequately monitor compliance with these conditions, therefore no specific monitoring, reporting, or recordkeeping is needed.

Conditions 27 - 30, General Source Testing and Monitoring Requirements

Legal Basis: [18 AAC 50.350(b)(3), 1/18/97]
[18 AAC 50.350(g) – (i), 1/18/97]
[18 AAC 50.345(l) – (o), 5/3/02]

Apply when the Permittee is required to conduct a source test.

Factual Basis: The underlying regulations are 18 AAC 50.220 and 50.346. These regulations are incorporated through conditions 27 - 30. Because these standard conditions supplement specific monitoring requirements stated elsewhere in this permit, no MR&R is required. The source test itself is adequate to monitor compliance with this condition.

Condition 31, Particulate Matter Calculations

Legal Basis: [18 AAC 50.220(f) & 18 AAC 50.350(g), 1/18/97]

Applies when the Permittee tests for compliance with the particulate matter standard.

Factual Basis: The condition incorporates a regulatory requirement for particulate matter source tests. The Permittee must use a certain equation to calculate the particulate-matter emission concentration from the source test results. Because this condition supplements specific monitoring requirements stated elsewhere in this permit, no monitoring, reporting, or recordkeeping is required.

Condition 32, Certification

Legal Basis: [18 AAC 50.205, 1/18/97]
[18 AAC 50.345(j), 5/3/02]
[18 AAC 50.350(b)(3), 1/18/97]
[18 AAC 50.350(i), 1/18/97]

Applies because the permit requires the Permittee to submit reports, and because the condition is a standard condition.

Factual Basis: This condition restates the regulatory requirement that all reports must be certified. To ease the certification burden, the condition allows the excess emission reports to be certified with the semi-annual operating report, although the excess emission reports must be submitted more frequently. This condition supplements the reporting requirements of the permit and no monitoring, recordkeeping or reporting for this condition is needed.

Condition 33, Submittals

Legal Basis: [18 AAC 50.350(i), 1/18/97]

Applies because the Permittee is required to send reports to the department.

Factual Basis: This condition merely specifies where submittals to the department should be sent. Receipt of the submittal at the correct department office is sufficient monitoring for this condition. This condition supplements the reporting requirements of the permit and no monitoring, recordkeeping or reporting for this condition is needed.

Condition 34, Information Requests

Legal Basis: [18 AAC 50.200, 1/18/97]
[18 AAC 50.345(a)(8), 1/18/97]
[18 AAC 50.350(b)(3), 1/18/97]
[18 AAC 50.350(g) – (i), 1/18/97]

Applies to all Permittees, and incorporates a standard condition

Factual Basis: Incorporates a standard condition in regulation, which tells the Permittee to submit information requested by the department. Receipt of the requested information is adequate monitoring.

Condition 35, Recordkeeping Requirements

Legal Basis: [18 AAC 50.350(h), 1/18/97]

Applies to records required by a permit.

Factual Basis: The condition restates the regulatory requirements for recordkeeping, and supplements the recordkeeping defined for specific conditions in the permit. The records being kept provide adequate evidence of compliance with this requirement, therefore, no additional monitoring, recordkeeping or reporting is required.

Condition 36, Excess Emission and Permit Deviation Reports

Legal Basis: [18 AAC 50.235(a)(2), 18 AAC 50.240(c), 18 AAC 50.350(i), 1/18/97, & 18 AAC 50.346(a)(3), 5/3/02]

Applies when the emissions or operations deviate from the requirements of the permit.

Factual Basis: This condition satisfies two regulatory requirements related to excess emissions—the technology-based emission standard regulation and the excess emission regulation. Although there are some differences between the regulations, the condition satisfies the requirements of each regulation.

The condition does not mandate the use of the department's reporting form, but it does specify that the information listed on the form must be included in the report.

The reports themselves and the other monitoring records required under this permit provide an adequate monitoring of whether the Permittee has complied with the condition. Therefore, no additional monitoring, recordkeeping or reporting is required.

Condition 37, Operating Reports

Legal Basis: [18 AAC 50.350(d)(4), 1/18/97]

[18 AAC 50.350(f)(3), 1/18/97]

[18 AAC 50.350(i), 1/18/97]

[18 AAC 50.346(b)(3), 5/3/02]

Applies to all permits.

Factual Basis: The condition restates the requirements for reports listed in regulation. The condition supplements the specific reporting requirements elsewhere in the permit and does not need any monitoring, recordkeeping or reporting. The reports themselves are adequate monitoring for compliance with this condition.

Condition 38, Annual Compliance Certification

Legal Basis: [18 AAC 50.350(j), 1/18/97]
 [18 AAC 50.350(d)(4), 1/18/97]
 [18 AAC 50.345(j), 5/3/02]

Applies to all Permittees.

Factual Basis: This condition specifies the periodic compliance certification requirements, and specifies a due date for the annual compliance certification. Because this requirement is a report, no monitoring, recordkeeping or reporting is needed.

Conditions 39 - 45, Standard Conditions Not Otherwise Included in the Permit

Legal Basis: [18 AAC 50.345(a)(1) – (7), 18 AAC 50.350(b)(3), 1/18/97, & 18 AAC 50.345(c), 5/3/02]

Applies to all operating permits.

Factual Basis: These are standard conditions required for all operating permits.

Condition 46, Permit As Shield from Inapplicable Requirements

Legal Basis: [18 AAC 50.350(l), 1/18/97]

Applies because the Permittee has requested a shield for the applicable requirements listed under this condition.

Factual Basis: The permit condition sets forth the requirements that the department determined were not applicable to the facility, based on the permit application, past operating permit, construction permits and inspection reports. The following table explains the permit shields that were not granted and the department's applicability determination.

Table 3. Permit Shields Not Granted

| FACILITY WIDE | |
|--|---|
| Applicable Requirements | Reason for Applicability |
| 18 AAC 50. Article 5, 6, 8 Reserved as amended through 1/18/97 | Agency cannot shield from a reserved article |
| 18 AAC 50.005 as amended through 1/18/97 | Any person who allows air contaminant to be emitted into the ambient air. |
| 18 AAC 50.010 as amended through 1/18/97 | Facility should conform to the ambient air quality standards. |
| 18 AAC 50.015 as amended through 1/18/97 | Facility is in the State of Alaska |
| 18 AAC 50.020(a), (b)(1), (b)(2) as amended through 1/18/97 | Facility is in the Cook Inlet Intrastate Air Quality control Region. |
| 18 AAC 50.030 as amended through 1/18/97 | Facility should conform to the State Air Quality Control. |

| FACILITY WIDE | |
|--|--|
| Applicable Requirements | Reason for Applicability |
| 18 AAC 50.035 as amended through 1/18/97 | Facility should conform to documents adopted by reference. |
| 18 AAC 50.045(f)(1), (f)(2), (f)(3)(A) - (f)(3)(C), as amended through 1/18/97 | Facility should conform to prohibitions and definitions. |
| 18 AAC 50.045(g)(1) -(g)(4) as amended through 1/18/97 | Facility should conform to prohibitions and definitions. |
| 18 AAC 50.080 as amended through 1/18/97 | Facility should conform to ice fog standards if deemed necessary. |
| 18 AAC 50.205 as amended through 1/18/97 | Facility should conform to the certification requirements. |
| 18 AAC 50.210 as amended through 1/18/97 | Facility should conform to the definitions |
| 18 AAC 50.215 as amended through 1/18/97 | Facility should conform to the ambient air quality analysis methods. |
| 18 AAC 50.225, 50.230 as amended through 1/18/97 | Applicable when triggered |
| 18 AAC 50.245 as amended through 1/18/97 | Facility should conform to agency's request |
| 18 AAC 50.250 as amended through 1/18/97 | Facility should conform to the procedures if necessary. |
| 18 AAC 50.300(a) as amended through 1/18/97 | Facility should conform to the definitions |
| 18 AAC 50.300(b) - (e), (h) as amended through 1/18/97 | Applicable when triggered |
| 18 AAC 50.300(f) as amended through 1/18/97 | Hazardous air contaminant major facility |
| 18 AAC 50.315, 50.320 as amended through 1/18/97 | Applicable when triggered |
| 18 AAC 50.322 as amended through 1/18/97 | Facility is a major source of HACs, applicable when triggered. |
| 18 AAC 50.325 as amended through 1/18/97 | Classifications apply to this facility |
| 18 AAC 50.340 as amended through 1/18/97 | Applicable when triggered |
| 18 AAC 50.345, 50.350 as amended through 1/18/97 | Applies to each operating permit |
| 18 AAC 50.380 as amended through 1/18/97 | Applicable when triggered |

| FACILITY WIDE | |
|--|---|
| Applicable Requirements | Reason for Applicability |
| 18 AAC 50.410 as amended through 1/18/97 | Facility shall pay emission fees |
| 18 AAC 50.910, 50.990 as amended through 1/18/97 | Facility should conform to the definitions |
| 40 CFR 50 | Facility should conform to ambient air quality standards. |
| 40 CFR 54 | Agency cannot shield from suits |
| 40 CFR 61, 61.140, 61.141, 61.156 | Asbestos abatement, Applicable when triggered |
| 40 CFR 63 | Applicable when triggered |
| 40 CFR 64 as amended through 10/22/97 | Applicable when triggered |
| 40 CFR 65 | Agency cannot shield from a reserved part |
| 40 CFR 66 | Agency cannot shield from EPA penalties |
| 40 CFR 70 | Facility subject to Alaska's operating program |
| 40 CFR 82, Subpart F | Applicable when triggered |
| CAAA Section 112(g) as amended through 11/15/90 | Applicable when triggered. |

Conditions 47 - 51, Visible Emissions and PM Monitoring, Recordkeeping and Reporting

Legal Basis: [18 AAC 50.346(c), 5/3/02]
 [18 AAC 50.350(g) – (i), 1/18/97]
 [18 AAC 50.350(d)(1)(C), 6/21/98]
 [18 AAC 50.055(b)(1), 1/18/97]
 [18 AAC 50.346(c), 5/3/02]

Applies because these conditions detail the monitoring, recordkeeping, and reporting required in conditions 4 and 5.

Factual Basis: These conditions have recently been adopted into regulation as a standard condition.

Each permit term and condition must include monitoring, recordkeeping and reporting for the Permittee to show verifiable compliance with each permit term and condition. The Permittee must establish by actual visual observations which can be supplemented by other means, such as a defined Facility Operation and Maintenance Program, that the facility is in continuous compliance with the State's emission standards for visible emissions and particulate matter.

These conditions detail a stepwise process for monitoring compliance with the State's visible emissions and particulate matter standards for liquid and gas fired sources. Equipment types

covered by these conditions are internal combustion engines, turbines, heaters, boilers, and flares. Initial monitoring frequency schedules are established along with subsequent reductions or increases in frequency depending on the results of the self-monitoring program.

Reasonable action thresholds are established in these conditions that require the Permittee to progressively address potential visible emission problems from sources either through maintenance programs and/or more rigorous tests that will quantify whether a specific emission standard has been exceeded.